

EXHIBIT Q

From: [William Ramey](#)
To: [Edlin, Elise \(SFO\)](#)
Cc: [Piepmeier, Sarah \(SFO\)](#); [Hester, Adam \(MSN\)](#); [Lamkin, Rachael](#); [Dreyer, Lauren](#); [Litigation Attorneys](#)
Subject: RE: Valjakka - PO Violation
Date: Saturday, February 15, 2025 6:13:27 AM
Attachments: [image001.png](#)
Importance: High

Hi Elise,

We are still reviewing e-mails and we have not found any transmissions of any NFX material to other than lawyers working under my direction on the case. Additional lawyers that were on the case are Josphe Zito and Weir King. They started in late 2023.

We see any motion for sanctions as baseless. Your team has known since at least late 2023 that each of Morehouse, Lund, Sheets, Zito and King were working on all aspects of the case.

As I previously informed you, I reached out to Mr. Valjakka on whether he would release his privilege and he said no. As well, to address Rachel's waiver argument, it is my understanding that the judge in VA ordered production and therefore there was no voluntary production.

My firm is not involved in this case any longer, but we have worked to address your concerns. Your unreasonable and vexatious conduct exposes each of you personally. At the latest, by August of 2023, you, Sarah and Rachel knew that my firm worked with Morehouse, Lund, and Sheets on all aspects of the case, including the expert reports. I cannot fathom why you raise this non-issue only now?

As always, if you need to discuss, let me know.

Bill

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From: Edlin, Elise (Perkins Coie) <EEdlin@perkinscoie.com>
Sent: Friday, February 14, 2025 12:33 PM
To: William Ramey <wramey@rameyfirm.com>
Cc: Piepmeier, Sarah (Perkins Coie) <SPiepmeier@perkinscoie.com>; Hester, Adam (Perkins Coie) <AHester@perkinscoie.com>; Lamkin, Rachael <rachael.lamkin@bakerbotts.com>; Dreyer, Lauren <Lauren.Dreyer@BakerBotts.com>; Litigation Attorneys <litattorneys@rameyfirm.com>
Subject: RE: Valjakka - PO Violation

Bill,

Thank you for the update. As I've mentioned, Netflix intends to file its motion to show cause and for sanctions next Tuesday, Feb. 18. We will include your statement below. And if you produce the requested information, we will update the Court accordingly and adjust the requested relief based on any production.

Thank you,

Elise Edlin
PARTNER

Perkins Coie

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From: William Ramey <wramey@rameyfirm.com>
Sent: Thursday, February 13, 2025 5:52 PM
To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>
Cc: Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>; Hester, Adam (MSN) <AHester@perkinscoie.com>; Lamkin, Rachael <rachael.lamkin@bakerbotts.com>; Dreyer, Lauren <Lauren.Dreyer@BakerBotts.com>; Litigation Attorneys <litattorneys@rameyfirm.com>
Subject: RE: Valjakka - PO Violation

Hi Elise,

I can confirm that only Morehouse, Lund and Sheets, attorneys working for me on the Valjakka case, received NFX material.

Let me know what else we can do to help you.

Thanks,

Bill

From: Edlin, Elise (Perkins Coie) <EEdlin@perkinscoie.com>
Sent: Wednesday, February 12, 2025 7:51 PM
To: William Ramey <wramey@rameyfirm.com>
Cc: Piepmeier, Sarah (Perkins Coie) <SPiepmeier@perkinscoie.com>; Hester, Adam (Perkins Coie) <AHester@perkinscoie.com>; Lamkin, Rachael <rachael.lamkin@bakerbotts.com>; Dreyer, Lauren <Lauren.Dreyer@BakerBotts.com>
Subject: RE: Valjakka - PO Violation

Hi Bill,

Can you please clarify what you mean by “client-controlled?” We are seeking all correspondence between Ramey LLP and AiPi related to this matter. To the extent that Mr. Valjakka claims privilege over any of this correspondence, then those emails should be logged, along with the basis for withholding.

Thank you,

Elise Edlin
PARTNER

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From: William Ramey <wramey@rameyfirm.com>
Sent: Wednesday, February 12, 2025 4:09 PM
To: Edlin, Elise (SFO) <EEdlin@perkinscoie.com>
Cc: Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>; Hester, Adam (MSN) <AHester@perkinscoie.com>; Lamkin, Rachael <rachael.lamkin@bakerbotts.com>; Dreyer, Lauren <Lauren.Dreyer@BakerBotts.com>
Subject: RE: Valjakka - PO Violation

Hi Elise,

The client will not allow me to produce the communications. We are trying to find transmission of NFX AEO material that are not a client-controlled communication, as we think most would not.

As you can imagine, we had a lot of communications with Eric Morehouse's team And most were not on this case.

What search terms would you like us to use?

Thanks,

Bill

From: Edlin, Elise (Perkins Coie) <EEdlin@perkinscoie.com>

Sent: Wednesday, February 12, 2025 6:02 PM

To: William Ramey <wramey@rameyfirm.com>

Cc: Piepmeier, Sarah (Perkins Coie) <SPiepmeier@perkinscoie.com>; Hester, Adam (Perkins Coie) <AHester@perkinscoie.com>; Lamkin, Rachael <rachael.lamkin@bakerbotts.com>; Dreyer, Lauren <Lauren.Dreyer@BakerBotts.com>

Subject: Valjakka - PO Violation

Bill,

I'm writing to follow up from our meet and confer on Monday in which you agreed to update us by yesterday on your plan for producing the requested communications. Please immediately provide a date certain when we can expect to receive the production, as we have been attempting to resolve this issue with you since December and will not delay further. Netflix intends to file its motion to show cause and for sanctions on Tuesday morning, February 18th. If you have not produced the documents at that point, we will note that in the motion and update the Court after receiving any documents.

Thank you,

Elise Edlin
PARTNER

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